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Attorney for Plaintiff ADRIAN ROMERO, JR.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

ADRIAN ROMERO, JR.,
Plaintiff,

vs.

CALIFORNIA HIGHWAY PATROL,
Defendant.

CASE NO.: 2:21-cv-01978-JAM-DB

**STIPULATION TO EXTEND DISCOVERY
DEADLINES; ORDER**

Plaintiff ADRIAN ROMERO, JR. ("Plaintiff") and Defendant CALIFORNIA HIGHWAY PATROL ("Defendant") (collectively, "the Parties"), through their respective attorneys of record, hereby move the Court to reschedule certain discovery deadlines set by this Court.

WHEREAS, the last day to disclose experts was January 5, 2024.

WHEREAS, the last day for supplemental disclosure was January 19, 2024.

WHEREAS, the last day of discovery in this matter is March 1, 2024.

WHEREAS, the last day to file a dispositive motion is May 3, 2024.

WHEREAS, the last hearing day for a dispositive motion is June 25, 2024.

WHEREAS, the pretrial conference is on August 23, 2024.

WHEREAS, the trial in this matter is set for October 7, 2024, which is seven (7) months after the discovery cut-off.

WHEREAS, on or around July 24, 2023, the Court granted a request to continue the aforementioned pre-trial and trial dates.

WHEREAS, discovery is ongoing and the Parties have not completed discovery in this matter.

WHEREAS, the Parties have agreed that they need additional time to conduct discovery and engage in settlement discussions.

WHEREAS, the Parties believe that the seven (7) months between the discovery cut-off and the trial date can be used to conduct discovery and engage in alternative dispute resolution.

WHEREAS, the Parties have met and conferred and agree that the discovery-related deadlines must be continued to allow for the Parties to continue to complete discovery in this matter.

Now, therefore, IT IS HEREBY STIPULATED by and between all the parties to this action as follows:

That the discovery-related deadlines set by this Court in its Order Modifying Pretrial Scheduling Order, dated July 24, 2023, be continued to later corresponding dates. The Parties suggest the following continued deadlines:

Event	Date
Last Day to Disclose Experts	March 1, 2024
Supplemental Disclosure	April 12, 2024
Last Day of Discovery	June 1, 2024
Last Day to File a Dispositive Motion	June 30, 2024
Hearing on Dispositive Motion	August 20, 2024 at 1:30 p.m.
Joint Mid-Litigation Statement Filing Deadlines	Fourteen (14) days prior to the close of discovery (May 16, 2024)

Final Pretrial Conference	September 27, 2024 at 10:00 a.m.
Trial	November 4, 2024 at 9:00 a.m.

IT IS SO STIPULATED.

Dated: February 21, 2024

LAW OFFICES OF DENISE EATON-MAY,
PC

By: /s/ Denise Eaton May

DENISE EATON-MAY
Attorneys for Plaintiff
ADRIAN ROMERO, JR.

Dated: February 21, 2024

Rob Bonta
Attorney General of California
Celine M. Cooper
Supervising Deputy Attorney General

By: /s/ Vanessa Mott

Vanessa Mott
Deputy Attorney General
Attorneys for Defendant CALIFORNIA
HIGHWAY PATROL

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Defendant.

CASE NO.: 2:21-cv-01978-JAM-DB

ORDER

After considering the Parties' stipulation, the Court hereby **EXTENDS** the discovery deadlines as follows:

Event	Date
Last Day to Disclose Experts	March 1, 2024
Supplemental Disclosure	April 12, 2024
Last Day of Discovery	June 1, 2024
Last Day to File a Dispositive Motion	June 30, 2024
Hearing on Dispositive Motion	August 20, 2024, at <u>01:00 p.m.</u>¹

¹ Calendars are subject to last minute changes. Contact the Courtroom Deputy for available dates.

Joint Mid-Litigation Statement Filing Deadlines	Fourteen (14) days prior to the close of discovery
Final Pretrial Conference	September 27, 2024, at 10:00 a.m.
Jury Trial (10-14 days)	November 4, 2024, at 9:00 a.m.

All other instructions contained in the January 05, 2022 Pretrial Scheduling Order (ECF No. 13) shall remain in effect.

IT IS SO ORDERED.

Dated: February 22, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE